

1 **QUESTION NO. 2:**

2 Was the subject vehicle not reasonably safe because Ford failed to provide adequate warnings or
3 instructions with the subject Ford Explorer at the time of manufacture and was this a proximate cause of
4 injury and damage to plaintiffs?

5 Yes _____ No X _____

6 *Answer Question 3*

7 **QUESTION NO. 3:**

8 Was the subject vehicle not reasonably safe because Ford was negligent in failing to provide
9 adequate warnings or instructions after the subject Ford Explorer was manufactured and was this a
10 proximate cause of injury and damage to plaintiffs?

11 Yes _____ No X _____

12 *If you answer Questions Nos 1, 2 or 3 "yes", answer Question No 4 If you answer Questions Nos 1, 2*
13 *and 3 "no", skip Questions Nos 4 and 5 and answer Question No 6*

14 **QUESTION NO. 4:**

15 Was Angela Jaramillo negligent and was that negligence a proximate cause of any injury and
16 damage to plaintiffs?

17 Yes _____ No _____

18 *Answer Question No 5 if you answered this Question "yes" If you answer this Question "no", skip*
19 *Question No 5 and answer Question No 6*

20 **QUESTION NO. 5:**

21 Assume that 100% represents the total fault that proximately caused Plaintiffs' injuries and
22 damages from the rollover incident What degree or percent of this 100% is attributable to the fault of

	Percentage
Ford Motor Company	_____ %
Angela Jaramillo	_____ %
TOTAL	100%

27 *(Your total must equal 100%) Answer Question No 6*

1 **QUESTION NO. 6:**

2 (a.) Was the roof of the subject vehicle not reasonably safe in design and was this a proximate
3 cause of Angela Jaramillo's death?

4 Yes _____ No X

5 (b) Was the roof of the subject vehicle not reasonably safe in design and was this a proximate
6 cause of McKenna Jaramillo's death?

7 Yes _____ No X

8 *Answer Question No 7*

9 **QUESTION NO. 7:**

10 (a.) Was McKenna Jaramillo's seat belt latched immediately prior to the rollover incident?

11 Yes X No _____

12 *If "yes" proceed to Question No 7(b) If "no" proceed to Question No 8*

13 (b) Was the rear middle safety belt of the subject vehicle not reasonably safe in design and was
14 this a proximate cause of McKenna Jaramillo's death?

15 Yes _____ No X

16 *Answer Question No 8 if you answered Questions Nos 1, 2, 3, 6(a), 6(b), or 7(b) "yes" Do not consider*
17 *the issue of contributory negligence, if any, in your answer If you answered Questions Nos 1, 2, 3, 6(a),*
18 *6(b), and 7(b) all "no", sign and return this verdict*

19 **QUESTION NO. 8:**

20 Without consideration of contributory negligence, if any, what do you find Plaintiffs' amount of
21 damages to be for

22 (a) The Survival Action brought on behalf of Angela Jaramillo's estate
23 (See Instruction No 30)

24 Angela Jaramillo's medical, funeral and
burial expenses \$ 4,102 60

25 Net accumulations lost to the estate \$ _____

26 Angela Jaramillo's shortened life
27 expectancy \$ _____

28 Angela Jaramillo's pre-death pain
and suffering \$ _____

1 (b) The Wrongful Death Actions for Angela Jaramillo's death
 2 (See Instruction Nos. 32 & 33)

3 Economic damages that Ken Jaramillo
 would have received from Angela Jaramillo \$ _____

4 Ken Jaramillo's loss of marital
 5 consortium \$ _____

6 Riley Jaramillo's loss of his mother's
 emotional support, love, affection, care,
 7 companionship, and guidance \$ _____

8 Sawyer Jaramillo's loss of his mother's
 emotional support, love, affection, care,
 9 companionship, and guidance \$ _____

10 (c) The Survival Action brought on behalf of McKenna Jaramillo's estate
 (See Instruction No. 31)

11 McKenna Jaramillo's medical, funeral and
 12 burial expenses \$ 12,504 80

13 Net accumulations lost to the estate \$ _____

14 (d) Ken Jaramillo's action for McKenna Jaramillo's death
 (See Instruction No. 34)

15 Ken Jaramillo's loss of McKenna
 16 Jaramillo's love and destruction of the
 parent-child relationship \$ _____

17 Ken Jaramillo's loss of companionship of
 18 McKenna Jaramillo. \$ _____

19 (e) Ken Jaramillo's personal physical injury claim
 20 (See Instruction No. 35)

21 Ken Jaramillo's undisputed expenses for
 medical care, treatment and service \$ 4,753.75

22 Ken Jaramillo's non-economic damages \$ _____

23 (f) Riley Jaramillo's personal injury claim
 24 (See Instruction No. 37)

25 Riley Jaramillo's undisputed expenses for
 medical care, treatment and service \$ 11,957 18

26 Riley Jaramillo's non-economic damages \$ _____

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(g) Sawyer Jaramillo's personal injury claim
(See Instruction No. 38)

Sawyer Jaramillo's undisputed expenses for
medical care, treatment and service \$ 11,432.80

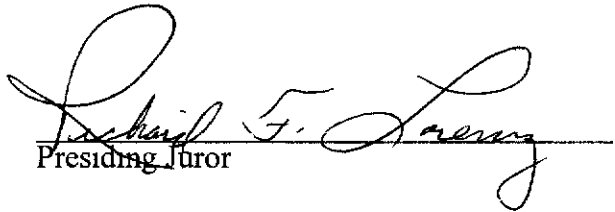
Sawyer Jaramillo's non-economic damages \$ _____

(h) Ken Jaramillo's claim for Emotional Distress
(See Instruction No. 36)

Ken Jaramillo's emotional distress damages
From witnessing the death of Angela Jaramillo \$ _____

Sign and return this verdict.

Dated March 13, 2003


Presiding Juror